

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHARLES BRENDON and DANIEL  
CHECKMAN, Individually And On Behalf Of All  
Others Similarly Situated,

Plaintiffs,

v.

ALLEGIANT TRAVEL COMPANY, MAURICE  
J. GALLAGHER, JR., SCOTT SHELDON,  
STEVEN E. HARFST, and JUDE I. BRICKER,

Defendants.

Case No. 2:18-cv-01758-APG-BNW

**SUPPLEMENTAL DECLARATION OF JOSEPHINE BRAVATA  
CONCERNING: (A) MAILING OF THE POSTCARD NOTICE; AND (B) REPORT ON  
REQUESTS FOR EXCLUSION AND OBJECTIONS**

I, Josephine Bravata, declare as follows:

1. I am the Quality Assurance Manager of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over eighteen years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over four hundred twenty-five (425) class action cases since its inception. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein.

**UPDATE ON MAILING OF NOTICE AND CLAIM FORM**

2. Pursuant to the Court’s Order Granting Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, dated January 14, 2020 (the “Preliminary Approval

1 Order”), SCS was appointed and approved as Claims Administrator in connection with the  
2 Settlement<sup>1</sup> in the above-captioned action.

3  
4 3. As noted in the Declaration of Josephine Bravata Concerning: (A) Mailing of the  
5 Postcard Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for  
6 Exclusion and Objections, dated April 15, 2020 (the “Bravata Declaration”), SCS mailed or  
7 emailed 1,312 letters to the Nominee Account Holders and Institutional Groups contained on  
8 SCS’s master mailing list. SCS then mailed 44,881 Postcard Notice to potential Settlement Class  
9 Members or nominees. Since the Bravata Declaration was filed, no additional Postcard Notices  
10 were mailed due to responses from Nominee Account Holders and Institutional Groups. A total  
11 of 44,881 Postcard Notices have been mailed to date.<sup>2</sup> Additionally, SCS was notified by one of  
12 the nominees that they emailed 4,126 of their customers to notify them of this settlement and  
13 provide direct links to the Notice and Claim Form on the settlement website.  
14

15 **UPDATE ON TOLL-FREE PHONE LINE**

16 4. The Bravata Declaration noted that SCS maintains a toll-free telephone number  
17 (1-866-274-4004) for Settlement Class Members to call and obtain information about the  
18 Settlement and/or request a Notice Packet. SCS has promptly responded to each telephone  
19 inquiry and will continue to address Settlement Class Member inquiries.  
20  
21  
22  
23

---

24 <sup>1</sup> All capitalized terms not otherwise defined herein have the meanings set forth in the Stipulation  
25 and Agreement of Settlement, filed on December 31, 2019 (the “Stipulation”).

26 <sup>2</sup> Out of the 44,881 Postcard Notices mailed, we received 16 requests from the potential  
27 Settlement Class Members to mail them the Notice of Pendency and Proposed Settlement of  
28 Class Action (“Notice”) and Proof of Claim and Release Form (“Claim Form”) (collectively, the  
“Notice Packet”) and we received 62 email addresses for potential Settlement Class Members to  
email the notice with direct links to the case webpage, [www.strategicclaims.net/allegiant/](http://www.strategicclaims.net/allegiant/).

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UPDATE ON WEBSITE**

5. The Bravata Declaration also noted that on January 22, 2020, SCS established a webpage on its website at [www.strategicclaims.net](http://www.strategicclaims.net). The webpage is accessible 24 hours a day, 7 days a week. The webpage contains the current status; the case deadlines; the online claim filing link; and important documents such as the Notice Packet, the Postcard Notice, the Preliminary Approval Order, and the Stipulation. On April 22, 2020, SCS updated the webpage on its website to include the Notice of Telephonic Hearing.

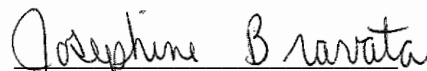
**UPDATE ON REPORT ON EXCLUSIONS AND OBJECTIONS**

6. The Postcard Notice, Notice, Summary Notice, and the settlement webpage informed potential Settlement Class Members that written requests for exclusion were to be mailed to SCS such that they were received no later than April 23, 2020. SCS has been monitoring all mail delivered for this case. As of the date of this Declaration, SCS has received one exclusion request. A copy of this request for exclusion was attached as Exhibit E to the Bravata Declaration.

7. According to the Notice, Settlement Class Members seeking to object to any part of the Settlement, and/or to Lead Counsel's motion for attorneys' fees and expenses and application for an Award to Plaintiffs must be submitted to Lead Counsel and Counsel for Defendants, as well as filed with the Clerk of the Court, no later than April 23, 2020. As of the date of this Declaration, SCS has not received any objections.

I declare under penalty of perjury that the foregoing is true and correct.

Signed May 7, 2020 in Media, Pennsylvania.

  
Josephine Bravata